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Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:
SPECTRUM LINK, INC.,
Debtor.

Case No. 2:21-bk-16403-VZ

Chapter 7

Adversary No.: 2:23-ap-01165-VZ

HOWARD M. EHRENBURG, Chapter 7
Trustee,

Plaintiff,

vs.

WILLIAM WALTER WRIGHT, an
individual, AMY BARRIOS-WRIGHT aka
AMY BARROWS WRIGHT, an
individual, AWB CONSULTING LLC, a
California limited liability company,
ENUMAH GROUP, LLC, a California
limited liability company, NEW
BEGINNINGS APOSTOLIC
COMMUNITY CHURCH, INC., a
California corporation, SLOANE
STREET, LLC, a Delaware limited
liability company, and OLD WORLD
ANTIQUITIES LLC, a California limited
liability company,

Defendants.

**STIPULATION REQUESTING
CONTINUANCE OF HEARING ON
ORDER TO SHOW CAUSE DUE TO
TENTATIVE SETTLEMENT**

OSC Hearing:

Date: November 9, 2023

Time: 11:00 a.m.

Place: Courtroom 1368
Roybal Federal Building
255 East Temple Street
Los Angeles, CA 90012

Howard M. Ehrenberg, the Chapter 7 Trustee and Plaintiff in this adversary
proceeding ("Trustee") and the above-captioned defendants ("Defendants"), through their

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1 counsel, file this stipulation to continue a hearing set by this Court, and related deadlines,
2 in the Court's September 18, 2023 "Order To Show Cause Why Defendant's Should Not
3 Be Held In Contempt Of This Court's Temporary Restraining Order" [Docket No. 56],
4 based on the following:

5 1. On June 5, 2023, the Trustee filed his complaint commencing this action;

6 2. On September 18, 2023, the Court entered an "Order To Show Cause Why
7 Defendants Should Not Be Held In Contempt Of This Court's Temporary Restraining
8 Order" (Docket No. 56, the "OSC Order");

9 3. The OSC Order: (i) sets a hearing before this Court for November 9, 2023,
10 at 11:00 a.m. (the "OSC Hearing"), on an Order for the Defendants to Show Cause why
11 Defendants should not be held in contempt for violating certain of this Court's prior
12 orders, (ii) requires Defendants to serve and file a written response no later than October
13 12, 2023, and (iii) requires the Trustee to serve and file a reply to that response no later
14 than October 26, 2023;

15 4. The Trustee and Defendants have reached a settlement of this adversary
16 proceeding, which has not yet been reduced to writing;

17 5. The Trustee and Defendants are currently preparing the documents necessary
18 to effectuate this settlement, all of which, if signed, will be attached to a motion the
19 Trustee will file with the Court seeking to approve that settlement;

20 6. The Trustee estimates that it will take approximately two weeks for the
21 parties to finalize and sign all documents, and for the Trustee to file and serve a motion
22 seeking Court approval of this settlement;

23 7. The Trustee does not desire the Defendants to incur additional attorney time
24 in responding to the OSC Order during this document-finalization period;

25 8. The Trustee and Defendants reached this tentative settlement on October 10,
26 2023, and on that date Trustee's counsel Steven F. Werth informed Defendants' counsel
27 Mr. Douglas Crowder, Esq. that Mr. Werth would prepare a stipulation for counsel to sign
28 proposing to continue the OSC Hearing;

1 9. The Trustee understands that Mr. Crowder, since October 10, 2023, has
2 proceeded in this adversary proceeding with the expectation that a stipulation would be
3 filed seeking to continue the OSC Hearing, although the Trustee has communicated to Mr.
4 Crowder, and the Trustee also understands, that the Court may not approve this stipulation.

5 10. Based on the above, the Trustee and Defendants stipulate, and respectfully
6 request, that:

7 (i) the OSC Hearing be continued approximately 60 days, to a date convenient
8 to the Court (the parties suggest January 11, 2024, at 11:00 a.m.),

9 (ii) the Defendants' deadline to file a response relating to the OSC Order is
10 continued to a date that is approximately 30 days prior to the date of the continued OSC
11 Hearing, and

12 (iii) the Trustee's deadline to reply to Defendants' response is continued to a date
13 that is approximately 14 days prior to the date of the continued OSC Hearing.

14 **SO STIPULATED.**

15 DATED: October 11, 2023

Greenspoon Marder LLP

16
17 By: 

18 Steven F. Werth

19 Attorneys for Howard M. Ehrenberg
20 Chapter 7 Trustee

21 DATED: October 11, 2023

CROWDER LAW CENTER, P.C.

22
23
24 By: 

25 Douglas A. Crowder, Esq.
26 Attorneys for Defendants
27
28

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1 **PROOF OF SERVICE OF DOCUMENT**

2 I am over the age of 18 and not a party to this bankruptcy case or adversary
3 proceeding. My business address is 1875 Century East, Suite 1900, Los Angeles,
4 California 90067.

5 A true and correct copy of the foregoing documents entitled (*specify*):
6 **STIPULATION REQUESTING CONTINUANCE OF HEARING ON ORDER TO**
7 **SHOW CAUSE DUE TO TENTATIVE SETTLEMENT** will be served or was
served (a) on the judge in chambers in the form and manner required by LBR 5005-
2(d); and (b) in the manner stated below:

8 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC**
9 **FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing

document will be served by the court via NEF and hyperlink to the document. On
10 (date) October 11, 2023 I checked the CM/ECF docket for this bankruptcy case or
11 adversary proceeding and determined that the following persons are on the
Electronic Mail Notice List to receive NEF transmission at the email addresses
12 stated below:

- 13 • **Douglas A Crowder** dcrowder@crowderlaw.com
- 14 • **Howard M Ehrenberg (TR)** ehrenbergtrustee@gmlaw.com,
15 ca25@ecfcbis.com;C123@ecfcbis.com;howard.ehrenberg@ecf.courtdrive.com;
Karen.Files@gmlaw.com
- 16 • **Mark S Horoupian** mark.horoupian@gmlaw.com,
17 mhoroupian@ecf.courtdrive.com;cheryl.caldwell@gmlaw.com;karen.files@gmlaw.com
- 18 • **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- 19 • **Steven Werth** steven.werth@gmlaw.com,
20 swerth@ecf.courtdrive.com;pdillamar@ecf.courtdrive.com,Karen.Files@gmlaw.com;patricia.dillamar@gmlaw.com

21 ☐ Service information continued on attached page.

22 **2. SERVED BY UNITED STATES MAIL:**

23 On (date) 2023, I served the following persons and/or entities at the last known
24 addresses in this bankruptcy case or adversary proceeding by placing a true and
correct copy thereof in a sealed envelope in the United States mail, first class,
25 postage prepaid, and addressed as follows. Listing the judge here constitutes a
26 declaration that mailing to the judge will be completed no later than 24 hours after
the document is filed.

27 ☐ Service information continued on attached page.
28

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* September 19, 2023, 2023 served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 11, 2023

Patricia Dillamar

/s/ Patricia Dillamar

Date

Printed Name

Signature